

Dan Levy

From: Amy Davis [amy.davis@hsblaw.com]
Sent: Monday, May 26, 2008 9:50 PM
To: Dan Levy
Cc: pbrown@bakerlaw.com; Anthony H. Lowenberg; mcarvalho@bakerlaw.com; John Bostany; Ron Paltrowitz
Subject: GMA ltr to/from D. Levy with several questions about discovery

Dan:

Thank you for your message. In response:

1. Understood, thank you. By separate correspondence to Ron, per the agreed protocol, we will ask you for dates for their (and Messrs Maloof and Altirs') depositions.

2. Do you have a transmittal letter or certificate of service to this effect? If not, how do you know how these requests were served or when?

3. I do not know to what you are referring. Please resend the correspondence and we will respond right away.

4. If this is the case, I want to work quickly to get you any missing attachments. Could you please identify the emails by bates label, even if just a few by way of example so we can understand why the production inadvertently omitted the attachments and the scope of the issue, and we will respond quickly.

5. I am responding to this request by separate correspondence to John.

Many thanks again.

Amy

Amy E. Davis

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From: Dan Levy [mailto:dan.levy@bozlaw.com]
Sent: Friday, May 23, 2008 2:34 PM
To: Amy Davis; pbrown@bakerlaw.com
Cc: Anthony H. Lowenberg; mcarvalho@bakerlaw.com; John Bostany; Ron Paltrowitz; Dan Levy
Subject: Discovery Issues

I just left voicemail messages for Amy and Peter and wanted to follow up with everyone on some open discovery issues.

1. Tony and Eddie are represented by this firm, so please don't contact them directly
2. I looked into the issue regarding GMA's discovery demands. They were originally served on the NY firm only and we are awaiting your responses
3. We sent a letter to Amy Davis regarding the privilege log and we are awaiting your reply

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4. I noticed in a few circumstances that certain emails embedded in the emails already produced were not produced as a separate, individual document, and therefore, it appears as though your production is incomplete
5. I also want to draw your attention to my earlier email regarding the unorthodox and uncustomary manner in which you produced the PDF documents

Please let me know when we can expect a response on these open issues.

Thanks,

Dan Levy



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6/5/2008